

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff,

v.

YORK COUNTY POLICE DEPARTMENT.

JAMES H. MORGAN, RICHARD PEDDICORD,

RAYMOND E. CRUAL, GENE FIELDS,

DET. KESSLER, CO. BAYLARK.

RANDY SIPES, BRIAN WESTMORELAND,

and DETECTIVE GLOWCZESKI

**Defendants,**

CIVIL ACTION NO. 1:01-CV-1015

(Judge Kane)

(Magistrate Judge Mannion)

**JURY TRIAL DEMANDED**

**NOTICE OF INTENT TO OBTAIN A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS**

**FOR DISCOVERY**

Plaintiff's intents to serve a subpoenas on the following Employers: State Of California, Department Of Justice, Office Of Attorney General; York City Police Department; District Attorney's Office, York County, PA; Springettsbury Police Department; Mail Box Etc., Owner Jan Metzler; Pennsylvania Office Of Attorney General; Mail Box Etc., Owner, Mike Baker, Riverside, California; to produce and permit inspection and copying of any and all documents, relating to investigation, complaints, misconduct, IAD Reports, Disciplinary Action, Training, Memorandums, and Work History, to be produce at SCI-Rockview, route 26, Bellefonte, PA 16823-0320, Visiting Room. You have Twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the issuance of the subpoena. If no objection is made the subpoena may be served.

Date: June 28, 2004

Respectfully Submitted,

1. Große Linner.

**Tyrone P. James, Pro se.**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION NO. 1:01-CV-1015
	:	(Judge Kane)
	:	(Magistrate Judge Mannion)
YORK COUNTY POLICE DEPARTMENT,	:	
JAMES H. MORGAN, RICHARD PEDDICORD,	:	JURY TRIAL DEMANDED
RAYMOND E. CRUAL, GENE FELLS,	:	
DET. KESSLER, CO. BAYLARK,	:	
RANDY SIPIES, BRIAN WESTMORELAND,	:	
and DETECTIVE GLOWCZESKI	:	
Defendants,	:	

CERTIFICATE OF SERVICE

I, Tyrone P. James, Plaintiff's, pro se, hereby certified that, I am this day serving a true and correct copy to assigned counsel's "Notice of Intent To Obtain A Subpoena To Documents And Things For Discovery," in the manner set forth below to the following, by placing said legal manila envelop, deposited into the institutional mail box, and turning over said documents to prison officials for mailing:

BY FIRST CLASS U.S. MAIL:

Jason C. Gburintano  
Pennsylvania Attorney General Office  
15th Floor, Strawberry Square  
Harrisburg, PA 17120

Donald L. Reihart, Esq.  
Law Office Of Donald L. Reihart  
3015 eastern Blvd., Suite 204  
York, PA 17402

Krintin G. Hogue  
State Of California, Department Of Justice  
Office Of The Attorney's General  
110 West A Street, Suite 1100  
P.O. Box 85266  
San Diego, CA 92186-5266

I, Tyrone P. James, certify that the foregoing are true and correct.  
pursuant to 28 U.S.C. § 1746

Date: June 28th, 2004

Tyrone P. James, Pro se  
EX 9451  
P.O. Box A  
Bellefonte, PA 16823-0320.

Tyrone P. James  
EX 9451  
P.O. Box A  
Bellefonte, PA 16823-0820

June 28, 2004

Clerk Of Court  
United States District Court  
Middle District Of Pennsylvania  
225th Walnut Street  
P.O. Box 983  
Harrisburg, PA 17108

RE: James v. York County Police Department, NO. 1:01-CV-1015.

Dear Clerk Of Court:

Good Day! Enclosed you will find Subpoenas, addressed to various of the Defendants employers; to be served on (1) York City Police Department, (2) Springettsburg Police Department, (3) District Attorney's Office, York County, (4) Pennsylvania Office Of Attorney General, (5) California Department Of Justice, Office Of The Attorney General, (6) Mail Box Etc., Riverside, California, and (7) Mail Box Etc. Eastern Blvd., York, Pennsylvania.

Along with these Subpoenas, are the U.S. Department Of Justice, United States Marshals Service, Process Receipt and Return.

On or around September 2001, the Honorable Judge Kane, issued an Order, permitting this Plaintiff, to proceed in Forma Pauperis. Plaintiff's is still incarcerated, indigent and without personal access to served these subpoenas. Therefore Plaintiff's request that the Clerk of Court forward these documents "Subpoenas" to the U.S. Marshals, for service of process; pursuant to 28 U.S.C.A. § 1915 (c); Lindsey v. United State R.R. Retirement Bl., 101 F.3d 444, 447-48 (5th Cir. 1996); Byrd v. Stone, 94 F.3d 217, 219 (6th Cir. 1996); Fed.R.Civ.P. Rule 4(c)(2).

I respectfully appreciate you cooperation in this matter. Thank you.

Your Truly,



Tyrone P. James, Pro se  
EX 9451.

cc: Jason C. Giurintano,  
Donald L. Reihart.  
Kristin G. Hoque; S.D.A.G.

AO88 (Rev. 1/94) Subpoena in a Civil Case

**Issued by the**  
**UNITED STATES DISTRICT COURT**

Middle

DISTRICT OF

Pennsylvania

TYRONE P. JAMES, Plaintiff  
 V.

**SUBPOENA IN A CIVIL CASE**

YORK COUNTY POLICE DEPARTMENT: ET. AL.,

Case Number:<sup>1</sup> 1:01-CV-1015

TO: YORK CITY POLICE DEPARTMENT

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): Any and all reports, documents investigation, files, complaints, letter or writing in the custody of the York City Police Department, relating to Police Officers, Richards Peddicord, Gene Fells, Raymond Craul, James H. Morgan, Anthony Glowczeski, for the period from date of appointment to present. Said writing should include all IAD reports of their personnel file, (Complaints, Discipline, Training, Misc)

PLACE  
 SCI-Rockview, Route 26 Bellefonte, PA 16823-0820, Visiting Rm.

DATE AND TIME 7-30-04

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Tyrone James Pro-se.

6-25-04

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

P.O. Box A, Bellefonte, PA 16823-0820

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO88 (Rev. 1/94) Subpoena in a Civil Case

Issued by the  
UNITED STATES DISTRICT COURT

Middle

DISTRICT OF

Pennsylvania

TYRONE P. JAMES, Plaintiff  
V.

## SUBPOENA IN A CIVIL CASE

YORK COUNTY POLICE DEPARTMENT;  
JAMES H. MORGAN, RICHARD PEDDICORD;  
RAYMOND E. CRAUL; GENE FELLS; ANTHONY Glowczeski, et. al.,  
TO: District Attorney's Office, York County, PA.

Case Number:<sup>1</sup> 1: CV- 01-1015

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): Personnel Records, of complaints, Grievances; Employment agreement; contracts; records of training; promotion; demotion; or discipline; letters of recommendation; letters of resignations; evaluation; work performance; and termination, statement of eligibility of rehire, on the following employees Det. Richard Peddicords; Det. Anthony Glowczeski; Det. Kessler; Gene Fells; and Raymond Craul

PLACE visiting room.

DATE AND TIME

State Correctional Institution- Rockview, Route 26, Bellefonte, 7-30-04

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Tyronne James Pro-se

6-25-04

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

P.O. Box A, Bellefonte, PA 16823-0820

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO88 (Rev. 1/94) Subpoena in a Civil Case

**Issued by the**  
**UNITED STATES DISTRICT COURT**

Middle

DISTRICT OF

Pennsylvania

TYRONE P. JAMES, Plaintiff  
 V.

**SUBPOENA IN A CIVIL CASE**

YORK COUNTY POLICE DEPARTMENT, ET. AL.,

Case Number:<sup>1</sup> 1: 01-CV-1015

TO: Springettsbury Police Department

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): Any and all reports, documents investigations files, complaints, letter or writings in the custody of the Springettsburg Police Department relating to Detective Raymond Edward Craul, for the period from date of his appointment as a police officers to the present. Said writing should include all IAD reports, of his personnel file ( complaints concerning misconduct, discipline, trianing and conduct

PLACE

DATE AND TIME

SCI-Rockview, Route 26, Bellefonte, PA 16823-0820; Visiting Rm.

7-30-04

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

*Tyrone James Pro-se*

6-25-04

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

P.O. Box A, Bellefonte, PA 16823-0820

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO88 (Rev. 1/94) Subpoena in a Civil Case

**Issued by the**  
**UNITED STATES DISTRICT COURT**

Middle

DISTRICT OF

Pennsylvania

TYRONE P. JAMES, Plaintiff

**SUBPOENA IN A CIVIL CASE**

V.

YORK COUNTY POLICE DEPARTMENT, ET., AL.,

Case Number:<sup>1</sup> 1:01-CV-1015

TO: MAIL BOX ETC., OWNER JAN METZLER: CLERKS TERISA MECCOY: AND NEIL ERDENBRACK.

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): Any and All, designated books, paper, documents, or tangle things; report investigation, search warrant, and inventory receipts, by Law Enforcement officers; Memorandum; Contract with customer mail boxes and the handling of packages; Rental contract pertaining to Tyrone James, between Jan. 1999, through Dec. 31, 2002. Personnel records of employees Terisa Meccoy, and Neil Erdenbrack, in relation to Jan. 8, 9, 10, 20

PLACE

SCI-Rockview, P.O. Box A, PA 16823-0820, Visiting Room

DATE AND TIME

7-30-04

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Tyrone James Pro Se.

6-25-04

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

P.O. Box A, Bellefonte, PA 16823-0820

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.



AO88 (Rev. 1/94) Subpoena in a Civil Case

Issued by the  
UNITED STATES DISTRICT COURT

Middle

DISTRICT OF

Pennsylvania

TYRONE P. JAMES, Plaintiff

## SUBPOENA IN A CIVIL CASE

V.

YORK COUNTY POLICE DEPARTMENT, ET. AL.,

Case Number:<sup>1</sup> 1:01-CV-1015

TO: Pennsylvania Office Of Attorney General

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): Any and all reports, documents investigations, files, complaints, letter or writings in the custody of the Attorney General Office relating to Agent James H. Morgan, and Brian Keith Westmoreland, for the period from date of their appointment as Agents to the present. Said writing should include all IAD reports of thier personnel files, ( Complaints, Misconduct, Discipline, Training, Termination).

PLACE

DATE AND TIME

SCI-Rockview, Route 26, Bellefonte, PA 16823-0820, Visiting Rm. 7-30-04.

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Tyronne James Pro se.

6-25-04

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

P.O. Box A, Bellefonte, PA 16823-0820

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.



AO88 (Rev. 1/94) Subpoena in a Civil Case

Issued by the  
UNITED STATES DISTRICT COURT

Middle

DISTRICT OF Pennsylvania

TYRONE P. JAMES, Plaintiff

## SUBPOENA IN A CIVIL CASE

V.

YORK COUNTY POLICE DEPARTMENT, ET. AL.,

Case Number:<sup>1</sup> 1:01-CV-1015

TO: MAIL BOX ETC., OWBER, MIKE BAKER: NORISA CLERK: RIVERSIDE CALIFORNIA

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): Any and All, designated book, paper, documents or tangle things; reports, investigation, search warrant, inventory receipt, by law enforcement officer, Randell Sipes, dated, January 1997 to present; Memorandum by Agent Randy Sipes; personnel files on Clerk Norissa, and law enforcement; training on the handling of packages, as to shipping by common courier, U.P.S. and Fed Ex; Shipping receipt for Jan. 8, 200

PLACE

DATE AND TIME

SCI-Rockview, Route 26, Bellefonte, PA 16823-0820, Visiting Room

7-30-04 (7-30-04)

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Tyrone James Pro-se

6-25-04

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

P.O. Box A, Bellefonte, PA 16823-0820

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

AO88 (Rev. 1/94) Subpoena in a Civil Case

Issued by the  
UNITED STATES DISTRICT COURT

Middle

DISTRICT OF

Pennsylvania

TYRONE P. JAMES, Plaintiff

## SUBPOENA IN A CIVIL CASE

V.

YORK COUNTY POLICE DEPARTMENT, ET. AL.,

Case Number:<sup>1</sup> 1:01-CV-1015

TO: STATE OF CALIFORNIA, DEPARTMENT OF JUSTICE, Office Of Attorney General.

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): Any and all reports, documents, investigation, files, complaints, letter or writing in the custody of the department Of Justice, California Office Of Attorney general, relating to Agent Randell Sipes, for the period from date of appointment to present. Said writing should include all IAD reports of his file (Complaints, Misconduct Discipline, Training, Termination); Memorandum to Mail Box Etc., Rive

PLACE

DATE AND TIME

SCI-Rockview, Route 26, Bellefonte, PA 16823-0820, Visiting Rm.

7-30-04

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

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ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Tyronne James Plo Se.

6-25-04

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

P.O. Box A, Bellefonte, PA 16823-0820

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.